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**Sprint**

Jay C. Keithley  
Vice President

Federal Regulatory Affairs  
401 9th Street, Northwest, Suite 400  
Washington, D.C. 20004  
Voice 202 585 1920  
Fax 202 585 1896  
jay.c.keithley@mail.sprint.com

December 5, 2000

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: "Interim Report on Spectrum Study of the 2500 - 2690 MHz Band:  
The Potential for Accommodating Third Generation Mobile Systems"  
ET Docket 00-232

Dear Ms. Salas:

By this letter, Sprint Corporation ("Sprint") responds to the Commission's November 15, 2000, "Interim Report on Spectrum Study of the 2500 - 2690 MHz Band: The Potential for Accommodating Third Generation Mobile Systems" ("Interim Report"). The Interim Report describes the current uses of the 2500-2690 MHz band and analyzes the potential for sharing of that band between third generation wireless systems and existing Instructional Television Fixed Service ("ITFS") and Multipoint Distribution Service and Multichannel Multipoint Distribution Service (collectively "MDS") licensees.

The Commission properly acknowledged in the Interim Report the recent multi-billion dollar investments that companies such as Sprint have made, first to acquire MDS spectrum and the rights to lease ITFS excess capacity, and now, to begin construction and operation of two-way broadband systems. As of December 5, Sprint's two-way broadband services using this spectrum are available to over 12,000 residential and small business customers in ten markets, including underserved and rural markets.

The Commission also correctly recognized the enormous complexities that would accompany any effort to alter the existing allocation of this spectrum. As the Commission understands, the long-term relationships between MDS and ITFS licensees are inextricably interwoven and mutually beneficial. Disturbing either incumbent licensee could prove fatal to the plans and objectives of both.

Sprint expects to comment fully when the Commission opens a rulemaking to address these issues later this month. However, Sprint commends the Commission for assuming an even-handed approach to these issues in its Interim Report.

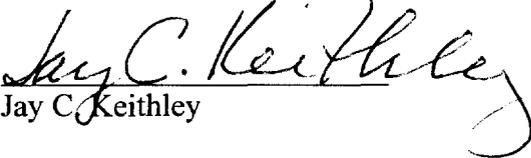
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An original and two (2) copies of this written presentation are being submitted in the above-noted proceeding with the Office of the Secretary.

Sincerely,

  
Jay C. Keithley

cc: Chairman William Kennard  
Commissioner Susan Ness  
Commissioner Harold Furchtgott-Roth  
Commissioner Michael K. Powell  
Commissioner Gloria Tristani  
Julius Knapp  
Diane Cornell  
Richard Engelman  
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